

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS**

TIARE TECHNOLOGY, INC.,

Plaintiff

v.

FIVE GUYS ENTERPRISES, LLC,

Defendant.

No. 2:21-CV-00151-JRG-RSP

JURY TRIAL DEMANDED

UNOPPOSED MOTION FOR 15-DAY EXTENSION TO RESPOND TO COMPLAINT

Defendant Five Guys Enterprises, LLC (“Defendant”) by and through the undersigned counsel, hereby respectfully moves the Court for a 15-day extension of time to respond to the original complaint, from July 27, 2021 to August 11, 2021. This motion is unopposed by Plaintiff Tiare Technology, Inc. (“Plaintiff”).

Defendant previously requested and received a total of 45 days extension to respond to the original complaint. Dkt. Nos. 7, 8. Defendant has requested, and Plaintiff has consented to, an additional 15 day extension, subject to the approval of the Court.

Defendant requests this additional extension in good faith in view of their upcoming deadline to respond to the complaint, and not for purposes of delay.

A proposed order is submitted herewith.

Dated: July 21, 2021

Co-Counsel:

Jacob S. Wharton
Jacob.wharton@wbd-us.com
WOMBLE BOND DICKINSON (US) LLP
1 West Fourth Street
Winston-Salem, NC 27101
Telephone: 336-747-6609
Facsimile: 336-726-6985

Attorneys for Defendant
FIVE GUYS ENTERPRISES, LLC

Respectfully Submitted,

By: Lowell D. Mead

Lowell D. Mead
lmead@cooley.com
COOLEY LLP
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: +1 650 843 5000
Facsimile: +1 650 849 7400

Attorneys for Defendant
FIVE GUYS ENTERPRISES, LLC

CERTIFICATE OF CONFERENCE

The plaintiff is unopposed to the relief requested herein.

/s Lowell D. Mead

Lowell D. Mead

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by U.S. First Class mail on July 21, 2021.

/s Lowell D. Mead

Lowell D. Mead